# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA, **Plaintiff**,

v.

CRIMINAL NO. 22-342 (SCC)(GLS)

JULIO M. HERRERA-VELUTINI, **Defendant.** 

# **UNOPPOSED MOTION FOR AUTHORIZATION TO TRAVEL**

#### TO THE HONORABLE COURT:

Julio M. Herrera-Velutini, through his undersigned attorneys, requests the Court authorization to travel to North Africa and the Middle East from February 26, 2024 to March 18, 2024.

As part of the conditions of release, set by the Honorable Magistrate Judge Lopez-Soler, Mr. Herrera-Velutini is allowed to travel abroad if he seeks the Court's approval and that of the USPO and the DOJ trial attorneys. *See* Dkt. No. 80 at page 1. Mr. Herrera who is currently residing in the United Kingdom has business commitments in North Africa and the Middle East (Abu Dhabi, Dubai, Qatar, Saudi Arabia, Morocco, and Tunisia) during the months of February and March, and for this reason requests permission to travel.

Mr. Herrera-Velutini has advised Pre-trial Services Officer Patricia Córdoba from the Puerto Rico District of his travel extension, and she has no objection. Mr. Herrera-Velutini will provide the Pretrial Officer the details of his extended travel dates, and the address where he will reside while traveling. Counsel for Mr. Herrera-Velutini has also consulted with the Government, and it has no objection.

**WHEREFORE,** Mr. Herrera-Velutini seeks the Court's authorization to travel from February 26, 2024 through March18, 2024.

#### RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 9th day of February 2024.

# **DLA Piper (Puerto Rico) LLC**

/s/ Sonia I. Torres-Pabon Sonia I. Torres-Pabon (USDC-PR No. 209310) sonia.torres@us.dlapiper.com 500 Calle de la Tanca, Ste. 401 San Juan, PR 00901-1969 Tel: 787-281-8100

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# **CERTIFICATE OF SERVICE**

It is hereby certified that on this date the present motion is filed with the Clerk of the Court through the CM/ECF electronic system which will notify and provide copies to all parties of record.

/s/ Sonia I. Torres-Pabón